



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

WILLIAM THOMAS GOSLING
Assistant Corporation Counsel
Phone: (212) 356-2384
Fax: (212) 356-3509
Email: wgosling@law.nyc.gov

May 27, 2020


BY ECF

Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15C
New York, New York 10007

Application GRANTED. The Initial Pretrial Conference and the deadline for submission of a Proposed Case Management Plan and Scheduling Order are ADJOURNED sine die. Defendant is directed to notify Plaintiff of this order.

5/27/2020

Re: Osiris Mosley v. Police Officer Danny Campbell
19 Civ. 10722 (LJL) (RWL)


LEWIS J. LIMAN
United States District Judge

Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to the above-referenced matter. In that capacity, I write, out of an abundance of caution, with the consent of plaintiff, to respectfully request: 1) an adjournment, *sine die*, of the initial conference currently scheduled for June 2, 2020 at 4:30 p.m., to a date and time after which defendant responds to the complaint and the current stay on this case is lifted¹; and 2) a corresponding extension of the deadline by which the parties must submit the case management plan. By way of background, on April 3, 2020, defendants filed a letter motion to the Court requesting a ninety-day stay in light of the current COVID-19 pandemic. See Docket Entry No. 13. On April 3, 2020, the Court granted a partial stay for this case until June 19, 2020.² See Docket Text Entry dated April 3, 2020. As the case is currently stayed until June 19, 2020, and since it is not addressed on the docket whether the initial conference is actually adjourned, defendant, out of an abundance of caution, respectfully

¹ Please take notice that the Office of the Corporation Counsel has not yet made a representation decision on behalf of Police Officer Danny Campbell. As such, we ask that the Court *sua sponte* grant the relief requested herein.

² Please be advised that in the Court's Order dated April 3, 2020, the Court did not set a deadline in which defendant must respond to the complaint. However, the Court's Order does require defendants to file a status letter by June 19, 2020 and to also meet and confer with the plaintiff prior to June 19, 2020, to discuss a revised case management plan before the defendant has had an opportunity to respond to the complaint.

requests: 1) an adjournment, *sine die*, of the initial conference currently scheduled for June 2, 2020 at 4:30 p.m., to a date and time after which defendant responds to the complaint and the current stay on this case is lifted; and 2) a corresponding extension of the deadline by which the parties must submit the case management plan to a date and time after which defendant responds to the complaint and the current stay on this case is lifted. The reason for these requests is that economy and efficiency would be promoted if an initial conference took place, and a case management plan was submitted, after defendant filed his response to the complaint and after the current stay is lifted.

In view of the foregoing, it is respectfully requested that the Court grant these requests. Thank you for your consideration in this matter.

Respectfully submitted,

William Thomas Gosling/s/
William Thomas Gosling
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Osiris Mosley
Plaintiff *pro se*
778 Morris Park Avenue, Suite 99
Bronx, New York 10462